

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEMETRIUS JOHNSON

Plaintiff,

V.

REYNALDO GUEVARA, et al.

Defendants.

Case No. 20 CV 4156

Judge Sara L. Ellis

Magistrate Judge Heather K. McShain

## JURY TRIAL DEMANDED

**PLAINTIFF'S CONSOLIDATED RESPONSE IN  
OPPOSITION TO DEFENDANTS' MOTIONS REGARDING SUMMARY JUDGMENT**

## EXHIBIT LIST

<b>Exhibit No.</b>	<b>Description</b>
1	Arrest Report, 07/22/1992
2	Plaintiff's Responses to Defendant Halvorsen's First Set of Interrogatories
3	Investigative File for RD# P272087
4	Permanent Retention File for RD# P272087
5	Deposition of Demetrius Johnson, 08/21/2022
6	Report of Guevara and Halvorsen, 07/23/1991
7	State of IL v. Johnson Report of Proceedings, 11/23/1992
8	State of IL v. Johnson Trial Transcripts
9	Johnson Petition for Certificate of Innocence, 06/12/2020
10	Testimony of Madalia Reyes
11	Testimony of Elizabeth Martinez
12	State of IL v. Johnson Order, 11/12/2019
13	State of IL v. Johnson Order Granting Certificate of Innocence, 04/07/2021
14	State of IL v. Johnson Report of Proceedings, 04/07/2021
15	Report of Hernandez and Johnson, 06/12/1991
16	Report of Guevara, 06/13/1991
17	Criminal Trial Testimony of Guevara
18	Report of Erickson, 6/13/1991
19	Report of Daley, 6/13/1991
20	Trial Testimony of Daley

21	Deposition of Daryl Daley, 06/02/2022
22	Report of Guevara and Hernandez, 06/13/1991
23	Expert Report of Thomas Tiderington
24	Testimony of Rosa Burgos
25	Carey Notes of Rosa Burgos, 1/9/1992
26	Criminal Histories of 06/12/1992 lineup fillers
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28	Deposition of Terrell Agee, 03/14/2023
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32	Report of Joshue Tepfer, 10/07/2019
33	Deposition of Aby Gonzalez, 04/19/2022
34	Report of Guevara and Erickson, 06/12/1991
35	Declaration of Carlos McFadden, 10/18/2022
36	Defendants Joint Initial Rule 26(A)(1) Disclosures, 11/2/2020
37	Notes of Kevin Sheehan
38	Deposition of Guevara, 04/20/2022
39	Deposition of Kevin Sheehan, 04/27/2022
40	Investigative Files, 05/19/1986
41	Petition for Relief from Judgment Pursuant to 735 ILCS 5/2-1401, 09/11/2019
42	Subpoena for CPD Records Division, 07/23/1991
43	Deposition of Deborah Gubin, 11/04/2021
44	Motion for Discovery, 10/22/1991
45	Deposition of Hon. Ruth Miller, 11/02/2021
46	Post-Conviction Petition, 3/20/1996
47	Brief and Argument for Appellant, 11/23/1992
48	Homicide Investigation File for RD# N262285
49	State of IL v. Baez Report of Proceedings, 07/17/1991
50	Report of Guevara and Halvorsen, 07/17/1991
51	Report of Guevara and Halvorsen, 07/22/1991
52	Testimony of Elba Burgos
53	Impound Evidence – Photo array
54	Criminal History of Darrell Johnson
55	Gomez v. Guevara, et al. Deposition of Richard Maher, 03/24/2021
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57	Rodriguez v. Guevara, et al. Deposition of Ed Mingey, 12/15/2021
58	Sierra v. Guevara, et al. 30(b)(6) Deposition of Lt. John Foster
59	Impound Evidence, Photo array
60	Report of Guevara, 6/23/1991

61	Lineup Photo of Demetrius Johnson
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73	Reyes v. Guevara, et al. 30(b)(6) Deposition of Eric Winstrom, 12/17/2021
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78	Investigative Files Order, 01/13/1983
79	Investigative Files Order, 05/02/1983
80	Investigative Files Order, 05/19/1986
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83	Rivera v. Guevara, et al. City of Chicago's Amended Response to Plaintiff's Seventeenth Set of Requests to Produce Documents, 03/27/2015
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85	Follow up: Review of the Chicago Police Department's Management and Production of Records, 09/2021
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100	Fields v. City of Chicago, et al. Trial transcript, 11/28/2016 AM
101	Fields v. City of Chicago, et al. Trial transcript, 12/06/2016 PM
102	Fields v. City of Chicago, et al. Trial transcript, 12/05/2016 PM
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294	State of IL v. Johnson State's Objection to Petitioner's Request for A Certificate of Innocent, 01/19/2021